

**Kirk W. Mylander**, OSB No. 993303

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**KRAEMER & LEWIS**

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Of Attorneys for Defendants City of Tigard and Megan Linn

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**BROOKLYN CLARK,**

No. 3:19-cv-00769-YY

Plaintiff,

v.

**SHELLY DOE, FRANKIE DOE, TIGARD  
POLICE DEPARTMENT, MEGAN LINN,  
COMMUNITY PARTNERS FOR  
AFFORDABLE HOUSING, RACHAEL  
DUKE, INCOME PROPERTY  
MANAGEMENT, HILLARY WINSLOW,  
ELENA SHAYLA,**

**DECLARATION OF KIRK W.  
MYLANDER IN SUPPORT OF  
DEFENDANTS MEGAN LINN AND THE  
CITY OF TIGARD'S MOTION TO  
COMPEL AND FOR SANCTIONS**

Defendants.

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I, Kirk W. Mylander, hereby declare under penalty of perjury that the following is true and correct:

1. I am one of the attorneys representing defendants City of Tigard and Megan Linn in this matter. This Declaration is offered in support of defendants' Motion to Compel.

2. Attached is a true and accurate copy of the January 20, 2020, emails exchanged between the parties, marked as Exhibit 1.

3. Attached is a true and accurate copy of the February 20, 2020 email from Raechelle Ottosen to Plaintiff sending Defendants' Initial Disclosures, marked as Exhibit 2.

4. Attached is a true and accurate copy of Brooklyn Clark's March 27, 2020 email, attaching a copy of appellant's opening brief in the matter of *Income Property Management and Greenburg Oaks v. Brooklyn Clark*. marked as Exhibit 3.

5. Attached is a true and accurate copy of the August 5 and 6, 2020 emails with Plaintiff, marked as Exhibit 4.

6. Attached is a true and accurate copy of the August 6, 2020 emails with Plaintiff, marked as Exhibit 5.

7. Defendants have incurred \$675 in attorney fees in preparing this motion to compel and for Sanctions for this case, which includes 1.5 hours of legal research and 1.5 hours drafting and revising the motion and supporting documents. Defendants' hourly rate is \$225.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 18th day of September 2020.

KRAEMER & LEWIS

By: s/ Kirk W. Mylander

Kirk W. Mylander, OSB No. 993303

[kmylander@cisoregon.org](mailto:kmylander@cisoregon.org)

Attorney for Defendants City of Tigard and  
Megan Linn

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of September 2020 I served the foregoing  
**DECLARATION OF KIRK W. MYLANDER IN SUPPORT OF DEFENDANTS MEGAN  
LINN AND THE CITY OF TIGARD'S MOTION TO COMPEL AND FOR SANCTIONS,**  
on the following party at the following address:

Brooklynn Clark  
[BrooklynnClark@mail.com](mailto:BrooklynnClark@mail.com)  
P.O. Box 6898  
Portland, Oregon 97228  
Plaintiff Pro Se

by mailing to her a true and correct copy thereof, certified by me as such, placed in a sealed  
envelope addressed to her at the address set forth above, and deposited in the U.S. Post Office at  
Portland, Oregon on said day with postage prepaid.

s/ Kirk W. Mylander  
Kirk W. Mylander, OSB No. 993303  
Attorney for Defendants City of Tigard and  
Megan Linn